

EXHIBIT 4

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DEAN MARINE & EXCAVATING, INC.
a Michigan corporation,

Plaintiff,

vs.

Case No.:
Honorable:

THE VESSEL "HELENE" her engines,
tackle, machinery, appurtenances, and
apparel, etc. in rem., a vessel on the navigable
waterways of the United States of America,
DANIEL DEANE, an individual,
NICHOLSON TERMINAL & DOCK COMPANY,
a Michigan Corporation, FIRST OF AMERICA BANK
– SECURITY nka FIRST OF AMERICA BANK –
SOUTHEAST MICHIGAN, N.A., a Michigan Corporation,
and SHAMROCK CHARTERING CO. a Michigan Corporation

Defendants.

AFFIDAVIT OF ACCOUNT DUE

STATE OF MICHIGAN)
) SS.
COUNTY OF MACOMB)

I, Dean Williams, being first duly sworn, depose and say that:

1. I am an officer for Dean Marine & Excavating, Inc. and, if called upon as a witness, can testify competently as to all matters set forth herein.

2. Daniel Deane and Nicholson Terminal & Dock Company are presently indebted to Dean Marine & Excavating, Inc. on open account in the

principal amount of One Hundred Twenty-Eight Thousand One Hundred Twenty-Seven and 12/100 Dollars (\$128,127.12), plus costs, interest, and attorney fees, over and above all known legal counter-claims or set-offs.

Further Affiant sayeth not.



By:

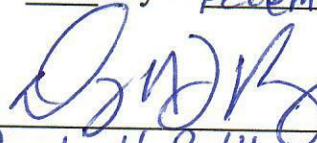
Dean Williams
Its: President

STATE OF MICHIGAN)
) SS
COUNTY OF MACOMB)

On the 5 day of December, 2024, before me, the undersigned, a Notary Public in and for said state, personally appeared Dean Williams, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that executed it.



Subscribed and sworn to before me
this 5 day of December, 2024.



Douglas H. Rettberg Notary Public
Oakland County, Michigan
My Commission Expires: 6.6.2028
Acting in the County of Macomb